## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

JOSALYN JOHNSON,	)	
Plaintiff,	)	
VS.	) ) )	No. 2:07-cv-02208 JURY DEMAND
FLUOR CORPORATION d/b/a	)	
FLUOR DANIEL, INC., d/b/a	)	
DEL-JEN, INC., DEL-JEN, INC. and	)	
HORIZONS YOUTH SERVICES, L.C.	)	
	)	
Defendants.	)	

## DEFENDANT HORIZONS YOUTH SERVICES, L.C.'S MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION TO TRANSFER

Comes now defendant Horizons Youth Services, L.C., pursuant to Rule 12(b) of the Federal Rules of Civil Procedure, and moves this Court to dismiss this case on the following grounds:

- 1. This Court does not have general or specific personal jurisdiction over this defendant;
  - 2. This lawsuit was filed in the improper venue; and
- 3. The convenience of the parties to this action would be better served if this case were litigated in another forum and this case should be dismissed, or alternatively transferred, under the doctrine of forum non conveniens.

Defendant has filed the following in support of this motion:

- 1. Memorandum of Law in Support of Motion to Dismiss; and
- 2. Affidavit of William John Hall.

Respectfully submitted,

LEVAN, SPRADER, PATTON & MCCASKILL, PLLC

By: /s/Christopher M. Jones

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served via electronic means via the Court's electronic system upon:

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Attorneys for Fluor Corporation d/b/a Fluor Daniel, Inc d/b/a Del-Jen, Inc. and Del-Jen, Inc.

on this the 1st day of August, 2007.

s/Christopher M. Jones Christopher M. Jones